

EXHIBIT C

Excerpt of the third discovery letter, dated March 25, 2015.



U.S. Department of Justice

Carmen M. Ortiz
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District of Massachusetts

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March 25, 2015

Via Federal Express

Bruce Singal
Michelle Peirce
Donoghue Barrett & Singal
One Beacon Street, Suite 1320
Boston, Massachusetts 02108

Re: United States v. Barry Cadden, et al., 14-cr-10363-RGS

Dear Counsel:

Pursuant to Fed. R. Crim. P. 16 and Rules 116.1 and 116.2 of the Local Rules of the United States District Court for the District of Massachusetts, the government hereby provides supplemental discovery in this case.

As you know, on January 16, 2015, the government filed a motion for a protective order to govern confidential discovery materials produced in this case, and filed a motion for reconsideration of the Court's order on that motion on March 10, 2015. The discovery materials produced herein contain highly sensitive personal, medical, and financial information. We request that you treat all of the discovery materials produced herein as if they are governed by the proposed order we filed with the Court, and not share them outside the terms of that proposed order, until the Court has ruled on the government's motion for reconsideration. If you will not agree to this, please let us know immediately.

Enclosed with this letter are the following:

Documents and Records Produced in PDF and Native Format on the Disc labeled
"PDF and Native Documents"

- Photos taken during the execution of the first search warrant at NECC (DOJ_NECC003705032-DOJ_NECC003705352) (folder name: 2012.10.16 Search Warrant Photos);

- Photos taken during the execution of the second search warrant at NECC (DOJ_NECC003705353-DOJ_NECC003705894) (*folder name*: 2012.10.31 Search Warrant Photos);
- Document and recording of the meeting of NECC creditors pursuant to Title 11, United States Code, Section 341 (DOJ_NECC003705895) (*folder name*: Bankruptcy Recording);
- Additional documents and records from the Centers for Disease Control and Prevention (DOJ_NECC003705896-DOJ_NECC003706861) (*folder name*: CDC Records 2015.0303);
- Records from the Massachusetts Department of Revenue (DOJ_NECC003708488-DOJ_NECC003709183) (*folder name*: Department of Revenue);
- Testing records provided pursuant to a Freedom of Information Act request to the FDA (DOJ_NECC003708481-DOJ_NECC003708487) (*folder name*: FOIA requests);
- Additional records from Middlesex Savings Bank (DOJ_NECC003706862-DOJ_NECC003708352) (*folder name*: Middlesex Savings Bank);
- Preliminary transcripts of selected NECC sales training recordings (DOJ_NECC001558388-DOJ_NECC001558390; DOJ_NECC003708476-DOJ_NECC003708480) (*folder name*: NECC Sales Audio and Video);
- Photos of isolates held in evidence (DOJ_NECC003708353-DOJ_NECC003708360) (*folder name*: Photos of NRL Isolates -WEAC); and
- Additional witness interview reports (DOJ_NECC003708361-DOJ_NECC003708475) (*folder name*: Witnesses).

Surveillance Video from NECC on Seven Discs

- Seven discs containing surveillance video seized from NECC labeled "Surveillance Video Disc."

Audio and Video Recordings from NECC Sales Trainings on Twenty-Six Discs

- Twenty-six discs containing audio and video recordings of NECC sales trainings labeled "NECC Sales Audio and Video."

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